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6 Attorneys for Defendant
7 BRUCE SAIYAD

8 UNITED STATES DISTRICT COURT
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10 NORTHERN DISTRICT OF CALIFORNIA
11
12 SAN FRANCISCO DIVISION

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 vs.

16 BRUCE SAIYAD, ET AL.

17 Defendants.

Case No. CR-11-00572 SI

**AMENDED STIPULATION AND
[PROPOSED] ORDER TO CONTINUE
STATUS HEARING**

18 Defendant BRUCE SAIYAD, by and through his appointed counsel Michael Hinckley,
19 Luis Romero by and through his appointed counsel Edward Hu of the Federal Public Defenders
20 Office, Jesus Perez by and through his counsel George Boisseau, and the United States of
21 America, by and through Assistant United States Attorney Matthew McCarthy, hereby stipulate
22 and agree to continue this matter from December 7, 2012 to January 25, 2013 at 11:00 a.m.

23 Good cause exists for this request in that Mr. Hinckley needs additional time to complete
24 his discovery review, investigation, and plea discussions due to the recent appointment of his law
25 partner Lidia Stiglich to the Nevada bench. As a result of this good fortune for Judge Stiglich,
26 Mr. Hinckley's caseload and firm administrative responsibilities have doubled overnight
27 necessitating this request. Additionally, counsel for defendants Perez and Romero request
28 additional time to complete review of discovery relevant to a potential plea and/or trial prior to
proceeding.

1 The parties also stipulate and agree that excluding the time resulting from this
2 continuance from computation under the Speedy Trial Act is appropriate for continuity of
3 counsel, effective case preparation, in the interest of justice and outweighs the best interest of the
4 public and the defendant in a speedy trial.

5 **IT IS SO STIPULATED.**

6
7 12/4/2012 /s/Matthew McCarthy
8 Dated: _____
9 Matthew McCarthy
Assistant United States Attorney

10 12/4/2012 /s/Michael Hinckley
11 Dated: _____
12 MICHAEL HINCKLEY
Attorneys for Defendant
13 Bruce Saiyad

14 12/4/2012 /s/Edward Hu
15 Dated: _____
16 EDWARD HU
Attorneys for Defendant
Luis Romero

17 12/4/2012 /s/George Boisseau
18 Dated: _____
19 George Boisseau
Attorneys for Defendant
20 Jesus Perez
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ORDER

GOOD CAUSE APPEARING, upon stipulation of the parties, this matter is continued from December 7, 2012 to January 25, 2013 at 11:00 a.m. for status.

Also, based upon the representation of counsel and the stipulation, and good cause shown, the Court finds that failure to exclude time from December 7, 2012 to January 25, 2013, would unreasonably deny defendant reasonable time necessary for effective preparation of his counsel, taking into account the exercise of due diligence as well as to insure continuity of counsel. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court finds that the ends of justice served by excluding time from December 7, 2012 to January 25, 2013, from computation under the Speedy Trial act outweigh the best interest of the public and the defendant in a speedy trial.

THEREFORE, IT IS HEREBY ORDERED that the time from December 7, 2012 to January 25, 2013, shall be excluded from computation under the Speedy Trial act. 18 U.S.C. § 3161(h)(7)(A) &(B)(iv).

IT IS SO ORDERED.

Dated: 12/06/2012

